

**EXHIBIT 1**

**DECLARATION OF JOSEPH P. ALLEN, IV**

I, Joseph P. Allen, IV, being first duly sworn, state and attest as follows:

1. In late January 2019, my brother, David T. Allen, M.D. ("David") visited me at the Grand Oaks Senior Living Community in Washington, D.C., where I was then residing. We discussed various legal issues of concern to both of us and decided to consult with an attorney about them.
2. We knew that our college friend and wrestling teammate, Peter Work ("Peter"), had practiced law for many years in D.C. and decided to contact him.
3. David called Peter, who is now living in Virginia, and he agreed to meet with us.
4. During this meeting, David and I had a long discussion with Peter about the legal issues that were concerning us, and we asked Peter whether he would be willing to represent us in addressing them.
5. Peter responded that he would be willing to represent us with regard to our anticipated legal issues, but said he did not wish to be compensated for his work.
6. We agreed to Peter's representation of David and me on that basis, and, by so doing, it was my understanding that we were creating attorney-client relationships.

7. I know that Peter has done a great deal of uncompensated legal work on  
David's and my behalf, and we greatly appreciate it.

I affirm under penalty of perjury under the laws of the United States that the  
forgoing is true and correct.

Joseph P Allen IV  
JOSEPH P. ALLEN, IV  
Aug 5, 2020

## **EXHIBIT 2**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

Joseph P. Allen, IV

v.  
Plaintiff,

Brown Advisory, LLC *et al.*

Defendants.

Civil Action No. 3:20-MC-00008-GEC

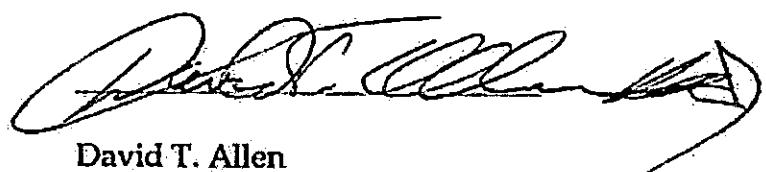
DECLARATION OF DAVID T. ALLEN

I, David T. Allen, being first duly sworn, state and attest as follows:

1. I am over 18 years old and am competent to testify concerning matters contained in this affidavit.
2. I have known Peter Work since the late 1950s when we both attended DePauw University in Greencastle, Indiana.
3. In late January 2019, I contacted Peter Work about meeting with my brother, Joseph P. Allen, IV, and me to discuss various legal issues we were facing.
4. On or about January 25, 2019, my brother and I met with Peter Work in Washington D.C. to discuss various legal issues, including an anticipated claim against Brown Advisory.
5. During this meeting, Peter Work agreed to provide legal advice with regard to these legal issues, and other issues that may arise on an on-going basis to Joe Allen and me.
6. Peter Work agreed to provide the aforementioned services pro bono, i.e. for no compensation.
7. During this meeting in late January 2019, Joe Allen and I established an attorney-client relationship with Peter Work that continues to this day.

8. I understand all of my communications with Peter Work to be privileged attorney-client communications and have operated as such since January 2019.

I affirm under penalties of perjury under the laws of the United States of America that the foregoing is true and correct.



David T. Allen



**EXHIBIT 3**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

Joseph P. Allen, IV, )  
Plaintiff, ) Case No. 3:20-mc-00008-GEC  
Brown Advisory LLC *et al.*, )  
Defendant )

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**DECLARATION OF PETER B. WORK**

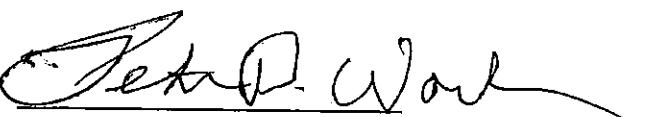
I, Peter B. Work, being first duly sworn, state and attest as follows:

1. I am a graduate of the University of Chicago Law School and am a member of the District of Columbia Bar.
2. Following a tour in the United States Marine Corps, I practiced law full time in the District of Columbia from 1968 until my retirement in 2015.
3. I am a founding partner of the D.C.-headquartered international law firm Crowell & Moring LLP.
4. After retiring from Crowell & Moring in 2015, I have continued practicing law on a strictly pro bono basis, representing individuals and non-profit organizations.

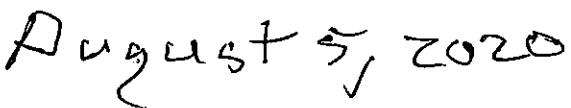
5. I have known Dr. Joseph P. Allen ("Dr. Joe Allen") and his brother David T. Allen ("Dr. Dave Allen") since the late 1950s, when the three of us were students and wrestling teammates at DePauw University in Greencastle, Indiana.
6. In late January 2019, I received a telephone call from Dr. Dave Allen asking if I would meet him and Dr. Joe Allen in Washington, D.C. to discuss various legal issues the two of them were then facing or anticipating. I agreed to do so.
7. At that meeting, Joe, Dave, and I discussed at length an array of legal issues they had encountered or were anticipating, including issues with the investment firm Brown Advisory, with the senior living facility in D.C. where Joe was then residing, and its affiliated physicians, and with Joe's daughter, Elizabeth Key. Joe and Dave both made clear that they would appreciate my assistance, as an attorney, in dealing with these issues. I responded that I would represent them but would do so only on an uncompensated, pro bono basis. Joe and Dave agreed to this arrangement, and we thereby created attorney-client relationships which continue to this day.
8. In the nineteen months since our initial January 2019 meeting, I have spent literally hundreds of hours representing Joe and/or Dave Allen in various legal matters, including their issues with Brown Advisory.

9. The Allens have both informed me that they do not waive the attorney-client privilege or the work product doctrine with regard to documents in my possession concerning my representation of them.

I affirm under penalties of perjury under the laws of the United States of America that the foregoing is true and correct.

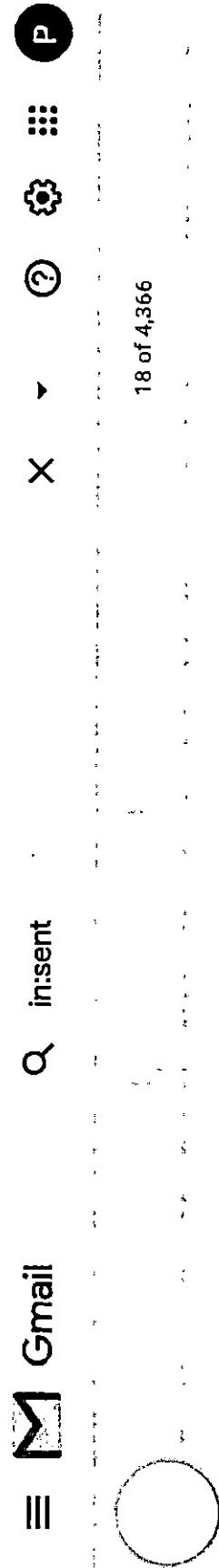


Peter B. Work



August 5, 2020

**EXHIBIT 4**



Peter Work <work.patarb@gmail.com>  
to Lynne.Pearle, David, Joseph, Marc

Lynne,

I am a long-term Crowell & Moring partner (now retired) of Marc Efron and am writing to you at his suggestion.

A week or so ago I received a call from Dave Allen, a college friend who is a prominent physician in Louisville. Dave was calling on behalf of his older brother Joe, also a college friend, who went on to earn a PhD in astrophysics from Yale, become the first scientist-astronaut, represent NASA before Congress, and become the president of a successful tech firm headquartered in Pentagon City.

Joe and his wife Bonnie lived for many years in Georgetown but are now at the Sibley assisted care facility.

Dave called me because Joe needs a first-class attorney to prepare a new will and assist him in dealing with a number of complex personal, property, and financial issues. I reached out to Marc for a recommendation, and he said that he and Barbara have been very pleased with the work you have done for them.

Dave and I talked again on Thursday, and he will be calling you for Joe on Monday.

The Allen brothers are delightful, smart people, and I hope you will be able to assist them.

Best regards,

Peter

P

Peter B. Work  
1326 Beautiful Run Road  
Aroda, Virginia 22709  
Tel: 540-672-5539  
Call: 207-316-2332